

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-207

SEAN A. JOCHIMS,

Defendant.

MOTION TO SEAL

NOW COMES the United States of America, by its attorneys, Richard G. Frohling, Acting United States Attorney for the Eastern District of Wisconsin, and Megan J. Paulson, Assistant United States Attorney for said district, and hereby moves the Court, pursuant to Rule 79(d) of the General Local Rules of the United States District Court for the Eastern District of Wisconsin, for an order sealing the proposed plea agreement pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure filed on October 13, 2021, in the above-named case until further order of this Court.

As a basis for said motion, the government relies upon the facts and circumstances described in said submission.

Respectfully submitted this 13th day of October, 2021 at Milwaukee, Wisconsin.

Respectfully submitted,

RICHARD G. FROHLING
Acting United States Attorney

By: s/ MEGAN J. PAULSON
Assistant United States Attorney